

In re:
Richard W. Johnson, Jr.
Alyse M. Johnson
Debtors

Case No. 21-10054-amc
Chapter 11

CERTIFICATE OF NOTICE

District/off: 0313-2
Date Rcvd: Aug 04, 2022

User: admin
Form ID: pdf900

Page 1 of 2
Total Noticed: 1

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Aug 06, 2022:

Recip ID	Recipient Name and Address
db/db	+ Richard W. Johnson, Jr., Alyse M. Johnson, 5 Sarah Drive, Newtown, PA 18940-4129

TOTAL: 1

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Aug 06, 2022

Signature: /s/Gustava Winters

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on August 4, 2022 at the address(es) listed below:

Name	Email Address
CAROL E. MOMJIAN	on behalf of Creditor Commonwealth of Pennsylvania Department of Revenue cmomjian@attorneygeneral.gov
DAVID B. SMITH	on behalf of Debtor Alyse M. Johnson dsmith@skhlaw.com b.dr70286@notify.bestcase.com
DAVID B. SMITH	on behalf of Debtor Richard W. Johnson Jr. dsmith@skhlaw.com, b.dr70286@notify.bestcase.com
GEORGE M. CONWAY	on behalf of U.S. Trustee United States Trustee george.m.conway@usdoj.gov
JAMI B. NIMEROFF, ESQ.	on behalf of Trustee JAMI B. NIMEROFF ESQ. jnimeroff@bmnlawyers.com, cjones@bmnlawyers.com;cblatt@bmnlawyers.com;cjn11@trustesolutions.net

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JAMI B. NIMEROFF, ESQ.

jnimeroff@bmnlawyers.com cjones@bmnlawyers.com;cblatt@bmnlawyers.com;cjn11@trustesolutions.net

MATTHEW E. K. HOWATT

on behalf of Creditor United States of America on behalf of IRS matthew.howatt@usdoj.gov
Sherri.Tiller-Nikazy@usdoj.gov;CaseView.ECF@usdoj.gov

NICHOLAS M. ENGEL

on behalf of Debtor Richard W. Johnson Jr. nengel@skhlaw.com

NICHOLAS M. ENGEL

on behalf of Debtor Alyse M. Johnson nengel@skhlaw.com

REBECCA ANN SOLARZ

on behalf of Creditor The Bancorp Bank bkgroup@kmlawgroup.com rsolarz@kmlawgroup.com

United States Trustee

USTPRegion03.PH.ECF@usdoj.gov

WILLIAM EDWARD CRAIG

on behalf of Creditor ACAR Leasing LTD d/b/a GM Financial Leasing ecfmail@mortoncraig.com mortoncraigecef@gmail.com

TOTAL: 12

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:
Richard W. Johnson, Jr., and
Alyse M. Johnson,
Debtors.

21-10054 (AMC)
Chapter 11

**STIPULATION OF SETTLEMENT REGARDING
UNITED STATES' OBJECTION TO PLAN**

This matter having been brought before the Court in an effort to achieve Confirmation of the Debtors' Chapter 11 Plan (the "Plan"), and the parties having resolved their issues regarding the United States' Objection to Confirmation of Debtor's Plan [Dkt. No. 50] (the "Objection to the Plan"), as stipulated below:

1. Debtors shall file all post-petition federal tax returns and pay all federal post-petition taxes as and when due. Unless a written modification of this provision or an extension to file federal taxes is granted by the Internal Revenue Service ("IRS"), failure to abide by this provision constitutes a default under this stipulation and the Plan.
2. The United States agrees to allow \$182,200 of its Priority Tax Claim (as defined in the Plan, and inclusive of interest) to be paid outside of the Plan.
3. Said \$182,200 is not forgiven and is exempt from discharge, and the IRS shall retain its lien(s) after discharge until the Debtors have paid the IRS Priority Tax Claim subject to said lien(s), at which point the IRS will mark the lien(s) satisfied.

4. Following completion of the Plan in December 2025, and beginning the last day of March 2026 and continuing at the last day of each quarter until the end of 2027, Debtors shall pay \$22,775 to the IRS.

5. If, at any time, the Debtors default on the terms set out in this stipulation, upon written notice and failure to cure within 30 days of receipt of that notice, any remaining unpaid balance owing to the IRS becomes immediately due. Upon an uncured default, the IRS can begin ordinary course collection efforts on any remaining amounts due under this stipulation, including restarting the accrual of additional interest at the applicable rate.

6. If, at any time, the Debtors' bankruptcy case is dismissed because the Plan is not confirmed or Debtors do not receive a discharge (e.g., the case is dismissed because Debtors fail to make Plan payments), then this stipulation is void and the and the IRS can begin ordinary course collection efforts on any remaining amounts due under the Plan or this stipulation, including restarting the accrual of additional interest at the applicable rate.

7. This agreement may be executed in counterparts and an electronic signature shall be considered an original signature.

8. In the event of any conflict between this stipulation and the Plan, confirmation order, or discharge order in this case, this stipulation governs.

9. The United States withdraws its Objection to the Plan.

The parties hereby agree to be bound by the form and entry of this stipulation:



David B. Smith
Attorney for the Debtors

MATTHEW
HOWATT

Digitally signed by
MATTHEW HOWATT
Date: 2022.08.02 15:01:51
-04'00'

Matthew E. K. Howatt
Assistant United States Attorney

SO ORDERED BY THE COURT:

Dated: _____, 2022

Date: August 4, 2022



HONORABLE ASHELY M. CHAN
UNITED STATES BANKRUPTCY JUDGE